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VIA ECFS

November 15, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12 Street, S.W., Room TW-B204
Washington, D.C. 20554

Re: Protecting Against National Security Threat to the Communications
Supply Chain Through FCC Programs, **WC Docket 18-89**

Dear Ms. Dortch:

In advance of the Federal Communication Commission's ("Commission") consideration of the upcoming Report and Order, and Further Notice of Proposed Rulmaking in the above-captioned proceeding (the "Circulated Order")¹, CoBank urges the Commission to modify the requirement in the *Circulated Order* to require Universal Service Fund ("USF") recipients to:

clearly demonstrate that no USF funds were used to purchase, **maintain**, improve, modify, **operate**, manage **or otherwise support** any equipment or services produced or provided by a covered entity (emphasis added).²

For those telecommunication companies that have deployed Huawei or ZTE network equipment to serve rural communities, a smooth, stable reimbursement mechanism is needed to continue to provide service. If the Commission prohibits the use of USF to provide ongoing maintainance and support of the existing network before the new network is built, rural communities will be at risk of losing their service. In addition to the high costs associated with constructing broadband infrastructure in rural areas, there are also high costs associated with maintaining and upgrading these networks to accommodate growth of data traffic. The broadband network is a dynamic infrastructure; frequent technological advances warrant continuous upgrades and regular capital investment.

CoBank borrowers who are impacted by the *Circulated Order* are at risk of being unable to maintain and support their existing network infrastructure serving rural communities.

¹ FCC-CIRC1911-01 (Oct. 29, 2019) *available at* <https://docs.fcc.gov/public/attachments/DOC-360522A1.pdf>

² *Circulated Order* at ¶ 66 (emphasis added).

CoBank urges the Commission to modify the *Circulated Order* and remove the draft language that would prohibit carriers from being able to “maintain,” “operate,” or “support” their networks with USF funds.

Respectfully submitted,

COBANK, ACB

By: /s/ Robert F. West

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